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13 Attorneys for SAMSUNG ELECTRONICS
 CO., LTD., SAMSUNG ELECTRONICS
 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 15

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

21 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 23 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,

24 Defendants.
 25

CASE NO. 11-cv-01846-LHK

**DECLARATION OF BILL TRAC IN
 SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 I, Bill Trac, declare:

2 1. I am an associate in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung
4 Telecommunications America, LLC (collectively, "Samsung"). Unless otherwise indicated, I
5 have personal knowledge of the facts set forth in this declaration and, if called upon as a witness, I
6 could and would testify as follows.

7
8 2. The requested relief is necessary to protect the confidentiality of information
9 discussed in the following documents:

- 10 a. Samsung's Notice of Motion and Motion to Compel Apple to Produce
11 Documents and Things; Memorandum of Points and Authorities in Support
12 Thereof;
- 13 i. Declaration of Diane C. Hutnyan in Support of Samsung's Motion
14 to Compel Apple to Produce Documents and Things, and exhibits;
- 15 b. Samsung's Renewed Motion to Compel Discovery Relating to Mac OS
16 10.0; Memorandum of Points and Authorities in Support Thereof;
- 17 i. Declaration of Diane C. Hutnyan in Support of Samsung's Renewed
18 Motion to Compel Production of Mac OS 10.0, and exhibits;
- 19 c. Samsung's Motion to Enforce Various Court Orders Requiring the
20 Production of Materials Relevant to Apple's Asserted Design Patents;
21 Memorandum of Points and Authorities in Support Thereof;
- 22 i. Declaration of Diane C. Hutnyan in Support of Samsung's Motion
23 to Enforce Court Orders, and exhibits;
- 24 d. Samsung's Motion for Clarification Regarding the Court's December 22,
25 2011 Order (Dkt No. 535);
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1 i. Declaration of Brett Arnold in Support of Samsung's Motion for
2 Clarification Regarding the Court's December 22, 2011 Order (Dkt
3 No. 535), and exhibits;

4 e. Samsung's Motion for Protective Order

5 i. Declaration of Diane C. Hutnyan in Support of Samsung's Motion
6 for a Protective Order.

7 **Samsung's Motion to Compel**

8 3. Exhibits K, M, S and T to the Declaration of Diane C. Hutnyan in Support of
9 Samsung's Renewed Motion to Compel include excerpts from documents or references to
10 documents that have been designated by Apple as Highly Confidential – Attorneys' Eyes Only
11 under the interim protective order, or otherwise contain Apple confidential information.

12 4. Exhibits A, B, D, J, L, N-R, U-Z, AA-CC to the Declaration of Diane C. Hutnyan
13 in Support of Samsung's Renewed Motion to Compel are discovery correspondences or other
14 documents which reference documents that have been designated by Apple as Highly Confidential
15 – Attorneys' Eyes Only under the interim protective order, or reference other information that may
16 be Apple confidential.

17 5. Portions of Samsung's Motion to Compel reference the exhibits cited above,
18 thereby referencing documents that have been designated by Apple as Highly Confidential –
19 Attorneys' Eyes Only under the interim protective order.
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22 **Samsung's Renewed Motion to Compel**

23 6. Exhibit A to the Declaration of Diane C. Hutnyan in Support of Samsung's
24 Renewed Motion to Compel include excerpts from documents that have been designated by Apple
25 as Highly Confidential – Attorneys' Eyes Only under the interim protective order.

26 7. Exhibits B and C to the Declaration of Diane C. Hutnyan in Support of Samsung's
27 Renewed Motion to Compel are discovery correspondences which reference documents that have
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1 been designated by Apple as Highly Confidential – Attorneys’ Eyes Only under the interim
2 protective order.

3 8. Portions of Samsung’s Renewed Motion to Compel reference the exhibits cited
4 above, thereby referencing documents that have been designated by Apple as Highly Confidential
5 – Attorneys’ Eyes Only under the interim protective order.
6

7 **Samsung’s Motion to Enforce**

8 9. Exhibits C and I to the Declaration of Diane C. Hutnyan in Support of Samsung’s
9 Motion to Enforce include excerpts from documents that have been designated by Apple as Highly
10 Confidential – Attorneys’ Eyes Only under the interim protective order.

11 10. Exhibits D and F to the Declaration of Diane C. Hutnyan in Support of Samsung’s
12 Motion to Enforce are discovery correspondences which reference documents that have been
13 designated by Apple as Highly Confidential – Attorneys’ Eyes Only under the interim protective
14 order.
15

16 11. Portions of Samsung’s Motion to Enforce reference the exhibits cited above,
17 thereby referencing documents that have been designated by Apple as Highly Confidential –
18 Attorneys’ Eyes Only under the interim protective order.

19 **Samsung’s Motion for Clarification**

20 12. Exhibits A-J to the Declaration of Brett Arnold in support of Samsung's Motion for
21 Clarification Regarding the Court’s December 22, 2011 Order (Dkt No. 535) are all documents
22 that have been designated by Apple as Highly Confidential – Attorneys’ Eyes Only under the
23 interim protective order.
24

25 13. Portions of Samsung’s Motion to for Clarification and the Declaration of Brett
26 Arnold in support of Samsung's Motion for Clarification reference the exhibits cited above,
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1 thereby referencing documents that have been designated by Apple as Highly Confidential –
2 Attorneys’ Eyes Only under the interim protective order.

3 **Samsung’s Motion for Protective Order**

4 14. Exhibits B through K to the Declaration of Diane C. Hutnyan in Support of
5 Samsung’s Motion for Protective Order include excerpts from documents that have been
6 designated by Apple as Highly Confidential – Attorneys’ Eyes Only under the interim protective
7 order.
8

9 15. Portions of Samsung’s Motion for Protective Order reference the exhibits cited
10 above, thereby referencing documents that have been designated by Apple as Highly Confidential
11 – Attorneys’ Eyes Only under the interim protective order.

12 **Proposed Public Redacted Versions**

13 16. Pursuant to this Court’s December 7, 2011 order (Dkt No. 455), attached as Exhibit
14 1 are is the proposed public redacted version of Samsung’s Motion to Compel and supporting
15 documents.
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17 17. Attached as Exhibit 2 are the proposed public redacted version of Samsung’s
18 Renewed Motion to Compel and supporting documents.

19 18. Attached as Exhibit 3 are the proposed public redacted version of Samsung’s
20 Motion to Enforce and supporting documents.

21 19. Attached as Exhibit 4 are the proposed public redacted version of Samsung’s
22 Motion for Clarification and supporting documents.
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24 20. Attached as Exhibit 5 are the proposed public redacted version of Samsung’s
25 Motion for Protective Order and supporting documents.
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I declare under penalty of perjury that the foregoing is true and correct. Executed in
Redwood Shores, California on January 10, 2012.

/s/ Bill Trac
Bill Trac

